

Appendix C: Local Area Plan Instructions

Local area plans serve as a four-year action plan to develop, align and integrate service delivery strategies to support Pennsylvania’s vision, strategic and operational goals within local workforce development areas as well as the regional goals and strategies (as appropriate).

Local area plans set forth the strategy to:

- Direct investments in educational and training programs to ensure that individuals, including youth and individuals with barriers to employment, have the skills to compete in the job market and that employers have a ready supply of skilled workers;
- Apply demand-driven strategies in the one-stop delivery system;
- Enable economic, education and workforce partners to build a skilled workforce through innovation in, and alignment of, employment, training and education programs; and

These requirements set the foundation for WIOA principles by fostering strategic alignment, improving service integration and ensuring that the public workforce system is industry-relevant, responding to the local area’s economic needs and matching skilled workers with employers.

Single local areas and *planning regions* are required to provide a local area plan that incorporates each prompt listed in this appendix. **Note:** In *planning regions*, there may be narrative duplication between the regional plan and the local area plan. Specific notes will indicate the proper action to follow.

The Pennsylvania Department of Labor & Industry, or L&I, includes a sub-section labeled “*Expectation*” for most prompts. This sub-section provides planners with practical concepts for developing narrative and creating a basis for discussion. Concepts are not all-inclusive but provide a foundation for building narrative. L&I will use each prompt’s general contextual meaning and *expectation* to evaluate narrative when reviewing each submitted local area plan.

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INTRODUCTION

Local areas have the option to summarize why and how the local area plan is created with hopes of expanding potential reader engagement. The introduction may include but is not limited to a summary of the strategic planning process, timeline and outcomes; or the purpose, design and how the local workforce development board, or LWDB, will use local area plan findings.

Note: Generic references to WIOA local area plan requirements already discussed thoroughly within the local area plan's designated sections are permitted.

1. STRATEGIC PLANNING: Local Area Workforce and Economic Analysis

Prompts in this section are designed to address aspects of the local area's labor force including composition and determination of skill gaps between the talent needed by employers in the region and the knowledge and skills held by workers and job seekers. One prompt addresses workforce development activity necessary to bridge the identified regional skill gaps.

Local boards may provide a comparative analysis describing similarities and differences between any of the regional plan narrative and what is (or may be) occurring in the local area.

Note 1: It is recommended that these plans include data samples, streamlined graphics and tables that support narrative provided instead of large volumes of data, tables and graphs.

(Revised) Note 2: When documenting various data methodologies, **only local boards who entered data into Attachment 4: Local Workforce Development System Supporting Data template during the PY 2021-2024 planning cycle are required to submit the attachment. Those** drafters **must** reference the data location in the plan narrative and move data samples, streamlined graphics and tables to Attachment 4.

Note 3: Every local board must cite the source(s) that are used to collect all or part of the regional labor market data (e.g., Center for Workforce Information and Analysis, or CWIA).

1.1. Identify the composition of the local area's population and labor force. [20 CFR § 679.560(a)(3)]

Expectation: Narrative must include a reference name for the region and the local area plan's effective date. Narrative must focus on characteristics about the region's population such as age distribution, educational attainment levels, individuals with barriers to employment (based upon WIOA Sec 3(24)) and employment status. This section must also focus on trends in each of these areas. Explain why some of these groups are harder or easier to serve. Data must be provided to support narrative as appropriate.

(Added) Note 1: When adding the initial reference of the local workforce development board into plan narrative, the legal name must be used at least once, before using an alternative Doing Business As, or D.B.A., moniker.

(Revised) Note 2: When documenting various data methodologies, drafters **who entered data into Attachment 4: Local Workforce Development System Supporting Data template during the 2021-2024 planning cycle must** reference the location of graphics and/or tables in prompt narrative.

1.2. How are skills gaps defined in the local area? Provide a description of the skills that are required to meet the needs of employers in region and local area? [20 CFR 679.560(a)(2)]

(Revised) Expectation: Narrative is not expected to be data-heavy and must focus more on **the application of data to/in** policy, best practices and knowledge of workforce. Narrative must explain how the local area identifies skills gaps that exist between regional employers' needs and the existing local area workforce qualifications. Narrative must highlight specific local examples of these gaps such as a workforce with insufficient and outdated skills, a workforce with skills that exceed job demand, a lack of training programs for needed skills and other factors unique to your local area.

The local area may support the narrative by:

- Focusing on the specific talent (knowledge and skills) believed to be needed by employers in the local area region;
- Speaking to employability skills, as well as hard skills—consider the focus on serving individuals with a barrier (or multiple barriers) to employment; and
- Identifying the certifications, degrees or fields of study most in-demand in the local area.

1.3. What are the challenges the local area face in aligning existing labor force skills and education and training activities with the needs of regional employers?

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Expectation: Local area plans must incorporate strategies that reflect local leaders and boards considering how to optimize the available opportunities and minimize the structural weakness presented by the current workforce system environment for the betterment of regional employers and the labor force. Narrative must also include incumbent worker training and how the local workforce delivery system will work with regional employers to fill the entry-level positions created by upskilling incumbent workers.

The local area may support the narrative by:

- Including descriptions of when leaders, board members and stakeholders met and any subjects or resolutions that came to fruition; and
- Summarizing any number of reports commissioned to research and determine recommended actions that are of concern to local area and regional workforce system leaders and stakeholders. Examples include studies indicating strategies and tactics that will increase employers' ability to attract, hire and maintain regional and local area labor force participants in gainful employment, or evaluating best practices for serving individuals with barriers to employment.

Note: While it is important that the drafters understand the data and connect the labor force requirements with occupational demands, it is also important to connect with actual employers who will verify that need.

1.4. Provide an analysis of local area workforce development activities, including education and training. [679.560(a)(4)]

Expectation: Narrative must present an analysis that includes the strengths and weaknesses of workforce development activities including education and training activities; the workforce system's capacity to provide activities necessary to address the workforce's education and skill needs, including individuals with barriers to employment and employers' needs; and how apprenticeship programs can be leveraged to address these needs when it comes to individuals with barriers to employment, individuals in underserved communities, diversity of individuals and employers' needs.

1.5. Describe strategic planning elements including a regional analysis of economic conditions. [20 CFR 679.560(a)(1)(i) and (ii)]

Expectation: Narrative must describe and analyze regional labor market data to articulate the region's economic conditions and employers' employment needs.

Factors being considered include, but are not limited to:

- Identifying existing and emerging in-demand industry sector(s);
- Identifying existing and emerging in-demand occupations;
- **(Revised)** Providing data describing the **industry** location quotients (LQ) of the local area(s); and
- Describing employers' employment needs in existing and emerging in-demand industry sectors and occupations.

Note: *Planning Regions* may reference and summarize similar narrative originally provided in Appendix B: *Regional Plan Instructions*, prompt 1.3.

2. STRATEGIC PLANNING: Vision and Goals

Consider the local area analysis developed in Section 1, *Local Area Workforce and Economic Analysis*, the goals established by the governor as outlined in the state plan and the goals established regionally. Each local area plan will provide narrative to the prompts outlined in this section. Responses will identify the local area's strategic vision and goals created by chief elected officials, the local board and the local workforce system stakeholders.

Note: If a local board is part of a *planning region*, responses will identify the local area's strategic vision and goals in support of the planning region.

2.1. What are the local board's strategic vision and goals for preparing its workforce? [WIOA Sec. 108(b)(1)(E); 20 CFR § 679.560(a)(5)]

Factors being considered include, but are not limited to:

- Local board's strategic vision;
- Local areas associated with *Planning Regions* must also consider their respective regional plan goals and strategies, list appropriate goals and strategies to maintain alignment; and
- Identifying any additional local board goals and strategies.

2.2. What is the local board's strategy to work with the entities that carry out the core programs to align resources available to the local area, in order to achieve the strategic vision and goals for the local area? [WIOA Sec. 108(b)(1)(F); 20 CFR § 679.560(a)(6)]

Expectation: Considering the local board's responses to prompts at Section 1, *Regional Workforce and Economic Analysis*, the

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narrative will describe the *strategy* developed by the local board to carry out the core programs and the programs of required and additional partners. Narrative will address how this strategy assists in aligning all available resources to achieve the local area's strategic vision and goals.

- 2.3. **How will the local board's vision and goals align with, support and contribute to the governor's vision and goals for the state's workforce development system, as well as any of the goals and strategies articulated in the regional plan?** [WIOA Sec. 108(b)(2); 20 CFR § 679.560(b)(1)(ii)]

Expectation: Narrative must indicate that the local board adopted the governor's vision and all goals as articulated in the WIOA Combined State Plan; it is expected that local board's goals and strategies are reasonably aligned with the WIOA Combined State Plan, as well as any appropriate regional plan goals and strategies (*wherever the local area is part of a planning region*).

Factors being considered include, but are not limited to:

- **(Revised)** How the local area will connect adults, dislocated workers and other targeted populations, especially youth and individuals with barriers to employment, to in-demand occupations **and Registered Apprenticeships**;
- How the skill gaps (addressed in the narrative to prompt 1.2 above) will be eliminated or narrowed;
- How the local board will target services efficiently to educate and increase its workforce's knowledge and skill sets;
- How the local board will develop and implement a comprehensive Career Pathways plan (including both employment and education components, as well as adult education) throughout the local area;
- How the local area will coordinate with secondary and post-secondary institutions (including programs authorized by the Perkins V Act) to align strategies, enhance services and avoid duplication of services (including specific reference to adult education, community colleges and community education councils);
- **(Revised)** How the system will improve access to services and to activities that lead to a recognized postsecondary credential **including Registered Apprenticeships**;
- How the local area will expand upon work-based training goals and strategies such as transitional jobs and leveraging existing apprenticeship programs or working with employers in the local area to develop new programs;
- How will local area business service strategies be employed (i.e., Business Service Teams, or BST); and
- How the goals support economic growth and economic self-sufficiency for the local area.

- 2.4. **What are the local levels of performance that have been negotiated with the governor and chief elected officials?** [WIOA 116(c); 20 CFR § 679.560(b)(16)]

How will the local board's goals relate to the achievement of these measures? [WIOA Sec. 108(b)(17); 20 CFR § 679.560(b)(5)]

(Revised 10/7/2022) Expectation 1: Local area plans must reference and include the completed WIOA Title I performance accountability **tables** found within the fillable template (i.e., Attachment 1: *Local Area WIOA Title I Programs Performance Accountability tables*). The **tables** incorporate the local area levels of WIOA negotiated performance goals **for current and/or upcoming program year(s)** and the attained performance measures **from the previous program year(s)**. **Attachment 1 must be revised annually. A plan modification is not required; however, an email notification of the revision must be provided to local area stakeholders including L&I. Further instructions are found within the attachment.**

Expectation 2: Narrative must describe how the local board's goals will assist in achieving the negotiated performance levels, and to what extent the local board's goals are impacted by such levels. Narrative must address how performance levels are used to measure local area performance.

3. OPERATIONAL PLANNING: Local Area Workforce System and Investment Strategies

The following responses will expand on the previous section's visions and goals including how the local board designs strategies to reach those goals.

Note: If a local board is part of a *planning region*, responses will identify the local area's strategic vision and goals in support of the planning region.

- 3.1. **Provide a descriptive overview of the governance structure for the workforce system, including key stakeholders and entities in the local area.**

Expectation 1: Narrative must include a description of how local elected officials, advocacy groups, LWDB, and other key stakeholders interact within the local workforce system. This description must include the respective roles and functional relationships of the following entities, as well as other entities, that compose the local workforce system.

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Factors being considered include, but are not limited to Governance and Administrative functions:

- The local elected officials in the governance of the local workforce system (i.e., local board), as well as the day-to-day operations of the local workforce delivery system;
- The identity and role of the entity responsible for the disbursement of grant funds (i.e., fiscal agent entity) as determined by the chief elected official(s);
- The role of the LWDB as the governing body responsible for the governance, strategic planning, fiscal and oversight of the local workforce system;
- Include a listing of each committee of the board (executive committee, if applicable, and each standing committee (required and ad hoc)). Provide a brief description of the function of each committee;
- The identity and role of the entity responsible for providing staff to the local board (i.e., administrative entity); and
- The identity and role of the individual(s) responsible for ensuring equal employment opportunities and civil right protections.

Expectation 2: Each local board must reference and include a completed organizational chart depicting a clear separation of duties between the local board and programmatic and service delivery entities (i.e., Attachment 2: *Local Workforce Development System Organizational Chart model*).

Structure Exceptions Note: Consistent with the Local Governance Policy, Section VI.F., *Restrictions*, in cases where career and training services are provided by an interrelated agency (i.e., county agency, commission structure or corporation) that is also the employer of the LWDB staff and fiscal agent staff, the service and training provider staff must report to a supervisor that does not oversee local board or fiscal agent staff. L&I has determined that any one of the interrelated agencies listed above must have separate departments to ensure a clear separation between governance and the day-to-day operations, and that each department head must report to a different local elected official. This structure is only allowable through written approval by the department.

If the local area has an approved structural exemption, the chief elected official(s), in collaboration with the local board, must reference the approved structure exemption and address any structural issues in this section of the local area plan. The narrative must articulate that when career and training services are provided by an interrelated agency that is also the employer of the local board staff and fiscal agent staff, that separate departments, internal controls and appropriate supervision for each department is in place.

3.2. What are the programs included in the local workforce delivery system and how will the local board work with the entities carrying out all workforce programs to support service alignment? [20 CFR § 679.560(b)(1)]

Factors being considered include, but are not limited to:

- Describe each local area workforce system's required and additional partner programs by referencing and including the completed program partner-provider list template (i.e., Attachment 3: *Local Workforce Development System Program Partner-Provider List*). This list identifies the programs, the program provider(s) and where in the local area the programs may be accessed;
- How will the local board collaborate with each required and additional partner in the PA CareerLink® service delivery system promoting service alignment; and
- How will alignment of such programs support the strategy identified in the state plan, the regional plan (if applicable) and the local area's strategies?

3.3. How will the local board work with the entities carrying out core programs to: [20 CFR § 679.560(b)(2)]

- Expand access to employment, training, education and supportive services for eligible individuals, particularly individuals with barriers to employment.
- Facilitate the development of Career Pathways and co-enrollment, as appropriate, in core programs (specify on-ramps from adult education).

Factors being considered include, but are not limited to:

- Describing the local board's methods of validating the eligibility of individuals, including the use of telephone verification and documentation inspection verification, especially in consideration of individuals with barriers to employment;
- Outlining the steps staff will take to verify eligibility prior to self-certification;
- Describing strategies and operational elements established to ensure that participant "co-enrollment" across relevant programs is practiced;
- (Revised) Describing strategies and operational elements established to increase awareness of and access to WIOA title II programs, including an understanding of Title II-specific eligibility requirements;

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- Describing strategies and operational elements established to increase awareness and access to the WIOA title IV programs, and that operational compliance concerns are addressed (e.g., qualified Office of Vocational Rehabilitation, or OVR, counselors determine eligibility for services);
- **(Revised)** Describing efforts to identify and improve access to activities leading to a recognized postsecondary credential including Registered Apprenticeships; and
- Describing operational elements that the local board developed to address the systemic process created to develop and promote Career Pathways.

3.4. What strategies will be implemented in the local area to improve business and employer engagement that: [20 CFR § 679.560(b)(3)]

- Support a local area workforce development system that meets the needs of businesses in the local area;
- Manage activities or services that will be implemented to improve business engagement;
- Better coordinate regional workforce and economic development strategy, messaging, engagement and programs; and
- Strengthen linkages between the PA CareerLink® service delivery system and unemployment insurance (UI) programs.

Factors being considered include, but are not limited to:

- Describing the local board's strategies and key operational elements that frame the following initiatives:
 - work-based training opportunities, including but not limited to incumbent worker training programs, on-the-job training, or OJT, programs, customized training programs and the use of apprenticeship models to support these programs;
 - industry and sector strategies;
 - career lattices and pathways initiatives (including how they are connected to adult education);
 - expanding apprenticeship models to include development of pre-apprenticeship programs to serve as a feeder to existing registered apprenticeship programs or in concert with development of new registered apprenticeship programs;
 - utilization of effective business intermediaries; and
 - other business services and strategies designed to meet the needs of regional employers.
- Describing who facilitates employer engagement in workforce development programs, including small employers and employers operating within in-demand industry sectors and occupations;
- How will the local board engage employers within in-demand industries and ensure that the employment and training activities in the local area meet the needs of its employers;
- Describing entity(s) tasked with the management and administrative roles of the business engagement services function (which includes employer case management, tracking of services and data research and analysis) as well as tracking which entities are making employer visits and the collaboration that occurs during these visits;
- Describing the roles and responsibilities of local board staff hired and contracted entities primarily tasked with business engagement related activities and services;
- How will the local board continue to develop appropriate ways to measure and benchmark employer outcome results;
- How will the local board improve key economic development partner relationships;
- How are programs and services being adopted by businesses and employers;
- If the local area has Industry Partnerships, how will the partnership employers influence not only the industry partnership training, but also that of the entire area;
- How will the local board improve strategies and practices to increase business and employer engagement over current levels;
- How will the local board better coordinate regional workforce and economic development strategy;
- If the local area has the Engage! Program, how will Engage! further strengthen the relationship between workforce and economic development; and
- **(Revised)** Unemployment Compensation (UC) representatives **may not be** deployed in the PA CareerLink® sites. **In the event UC staff are not present**, only UC courtesy phones and PC's are provided. Describe the local board's strategies and operational elements it uses to support unemployment insurance programs and resources employed for the benefit of the local area businesses and citizens.
 - Describe how UC claimants are provided reemployment services, including a brief overview of how the local board manages the "Reemployment Services and Eligibility Assessment" (RESEA) program;
 - Describe how the local board supports UC claimants, indicating they are complying with Pennsylvania's UC law "Register for Work and Work Search"; and

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- Indicate how the local board identifies and refers to UC for adjudication, listing any potential UC eligibility issues identified during RESEA or any other UC claimant interaction.

Note: Narrative may contain other strategies the local board employs to expand employment and career advancement opportunities for workforce development system participants within in-demand industries or sectors. Narrative may also describe the local board's plan to leverage unemployment insurance resources including but not limited to collaboration with UC regarding quarterly Employer UC Presentations, requesting UC assistance in promoting Employer UC Presentations as necessary and using UC as a resource for Employer contact when applicable.

- 3.5. **How will the local board coordinate local area workforce investment activities with regional economic development activities that are specific to a local area? How will the local board promote entrepreneurial skills training and microenterprise services?** [20 CFR § 679.560(b)(4)]

Factors being considered include, but are not limited to:

- How will the local board strategically coordinate with regional economic development and employer partners in the local area to identify and fulfill industry needs;
- Describing regional and local area DCED supported activities (e.g., Small Business Development Centers, or SBDCs, which are PREP agencies) that collaborate with interested entities;
- Describing resources the local board will use to promote entrepreneurial skills training and microenterprise services;
- How is the local board measuring employer outcome results; and
- How will the local board support and promote a training strategy that leads to self-employment? How might this strategy be used to help individuals or participants with barriers to employment (e.g., persons with disabilities and ex-offenders)?

Note: Alignment between the public workforce system and local economic development activities (e.g., Engage! or PREP) is critical in order to identify and fulfill industry talent needs by training customers for emerging and in-demand job skills. Furthermore, microenterprise development refers to training for the purposes of self-employment. This training strategy may be appropriate for individuals or participants with barriers to employment, including persons with disabilities. *WIOA Final Rules, Preamble pg. 56108, first column.*

4. OPERATIONAL PLANNING: Local Area Workforce Delivery System

Prompts in this section require greater detail and must focus on how the local board will execute the strategies in section 3. The responses in this section must be more explicit: expanding on the roles of all partners, including examples of specific employment and training activities, as well as specific employer engagement methods.

- 4.1. **Provide a descriptive overview of the local area workforce delivery system, including key stakeholders and entities in the local area.**

Expectation: Narrative must include a description of how local elected officials, advocacy groups, the LWDB, required and additional partners and other key stakeholders interact within the local area workforce service delivery system. This description must include the respective roles and functional relationships of the following entities, as well as other entities, that compose the local workforce service delivery system.

Factors being considered include, but are not limited to Programmatic functions:

- The identity and key role(s) of the PA CareerLink® operator(s) in the local area. Include a summary of the competitive process used (or will be used) to procure such entity;
- The entity or entities identified to provide WIOA title I programs and activities in the local area. Include a summary of the competitive process used (or will be used) to award the subgrants and contracts;
- The entity or entities that provide WIOA title II, Adult Education and Literacy programs and activities in the local area;
- The entity or entities that provide WIOA title III, Wagner-Peyser programs and activities in the local area;
- The entity or entities that provide WIOA title IV, Vocational Rehabilitation programs and activities in the local area;
- The identity and role of the individual(s) responsible for ensuring equal employment opportunities and civil right protections;
- Advocacy groups in the local area; and
- Other key stakeholders that compose the local area workforce delivery system network.

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- 4.2. Identify the one-stop partners (required and other) authorized to provide required and other programs within the local area. Describe briefly the role(s) of the one-stop partners (required and other). [20 CFR § 679.560(b)(5)(iv)]

Expectation 1: Narrative must list each of the one-stop partners, as well as describe their roles and the resource contributions to the local area workforce delivery system. Examples of resource contributions may include but are not limited to in-kind and programmatic contributions.

Expectation 2: Local boards are required to reference and include the completed program partner-provider list (i.e., Attachment 3: *Local Workforce Development System Program Partner-Provider List*). This list identifies comprehensive and affiliate PA CareerLink® sites, specialized centers and the programs available at each.

- 4.3. How will the local board facilitate access to services provided through the one-stop service delivery system? [20 CFR § 679.560(b)(5)(ii)]

(Revised) Expectation: The narrative must explain how the local board plans to facilitate access to services provided through the one-stop service delivery system, with evidence of efforts to expand access regarding the provision of employment, training, education and supportive services for eligible individuals, particularly concerning individuals with barriers. Consideration must be given to ways that technology, transportation and information sharing help expedite service access to customers, especially to remote and rural areas, target populations and individuals with disabilities. Available educational services, training programs and outreach activities must be described regarding services that partner agencies provide, and how to access such services.

The narrative must describe specifically how the local board facilitates service access with a consideration of the following:

- Plans to leverage resources and expand capacity within the local area workforce delivery system;
- Facilitates access to services provided through the one-stop delivery system (including facilitating access in remote areas);
- Describes efforts to provide quality services to remote and rural areas using technology and other means;
- In conjunction with a WIOA participant's interaction with the one stop delivery system, and program case managers in particular, describes how and when participant or employer information is entered into the state's system of record (i.e., CWDS). If a program case manager does not enter some or all the participant and employer information, describe who enters the information. Describe when the participant or employer information is entered into the state's system of record (i.e., CWDS) in relation to the time services were actually performed;
- Describes other state-owned case management information system(s) employed in the local area that WIOA participants' information is entered and stored (examples include, but are not limited to Unemployment Insurance, Adult Education and OVR). The local area must indicate the program partner that is the responsible entity that uses the case management information system;
- Describes the process that identifies participants not provided with WIOA title I and Title III career and training services but are enrolled in other WIOA programs. Describe how and when these WIOA participants' services and activities are entered into the CWDS;
- Lists non-Commonwealth owned and leased information management system(s) employed in the local area to aid in the management of WIOA programs (include information management system(s) used by contracted service providers). If such system(s) is used, describe the process the local area uses to align the WIOA participant information entered into the local area's additional non-Commonwealth owned and leased case management information system(s) with CWDS. The local board must provide a rationalization for why this data alignment process with CWDS is an optimum utilization of time, effort and funds;
- Participates in the development of Career Pathways that provide access to employment and training for individuals in adult education programs;
- Utilizes partners' program information sharing in ways that stress the importance of getting the information to customers quickly, as well as ensuring that communication is accessible;
- Identifies strategies for better meeting the needs of individuals with barriers to employment (such as improving digital literacy skills);
- **(Revised)** Ensures access to services, i.e., interpreters and translated documents, for limited English speaking and reading populations, as well as for persons with impairments (visual, hearing, other accessibility needs);
- **(Added)** Describe language assistance requests received;
- **(Added)** Describe reasonable accommodations requested by employees and participants, and the response provided to the request; and
- **(Added)** If applicable, describe the level of participation in the Supplemental Nutrition Assistance Program, or SNAP, and what factors led to this partnership within your local area.

Note: Off-site program partner service locations may provide access to career services.

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- 4.4. How will entities within the one-stop service delivery system, including one-stop operators and the one-stop partners, comply with WIOA Sec. 188 (as applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101, et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology and materials for individuals with disabilities? [20 CFR § 679.560(b)(5)(iii), 29 CFR § 38.40]

Expectation 1: The narrative must indicate how WIOA section 188 compliance, including civil rights and equal opportunity, and Americans with Disabilities Act of 1990 applicable provisions will be assured for those who avail themselves of the local area's one-stop delivery system services and resources (and that resources are at an appropriate reading level for the general population, including regional designated services locations and mobile one-stops).

Factors being considered include, but are not limited to:

- List key technology and materials at the one-stop available for use by individuals with disabilities.
- Describe operational support for addressing the needs of individuals with disabilities.
- Describe efforts to address the needs of individuals' with limited English proficiency, or LEP.
- If applicable, describe program partner and stakeholder actions related to this prompt.
- Describe local area staff trainings related to the subject matter (e.g., civil rights, equal opportunity, LEP, physical and programmatic accessibility, disability etiquette and sensitivity training) in this section and indicate when the trainings occurred.
- List the one-stop program partners participating in local staff training indicative of the subject matter noted in this section.
- (Revised) Describe corrective actions addressed as a result of L&I's Office of Equal Opportunity annual compliance reviews and state current OEO compliance status (i.e., discrimination complaint procedures, LEP, affirmative outreach, training, and accessibility).

Expectation 2: The narrative must indicate compliance with affirmative outreach, which **requires** recipients to make reasonable efforts to include various groups including different sexes' racial and ethnic/national origin groups, religions, and individuals with limited English proficiency, disabilities, and ages whether or not there is a specific funding stream.

Factors being considered include, but are not limited to:

- Describe outreach efforts such as: targeted media advertising (e.g., radio, newspaper, social media), sending notices about program openings and activities to schools, community groups and other special-interest groups that serve the targeted populations.
- (Revised) Since affirmative outreach includes training programs, outreach efforts and other positive steps, describe consultation with groups serving the targeted populations about efforts to improve outreach, training and services to targeted populations, and describe input received identifying training, education and services needed from organizations representing these groups, or programs, that interact with target populations, and how these needs are being addressed.

- 4.5. Describe how the local board will ensure the continuous improvement of eligible providers through the system and that such providers will meet the employment needs of local area employers, workers and job seekers. [20 CFR § 679.560(b)(5)(i)]

Expectation: Narrative must describe how the local board determines the variety, quantity and quality of workforce services (i.e., employment, education and training activities), the service providers and the activities that support this endeavor.

Factors being considered include, but are not limited to:

- Explaining the local board's periodic process that may employ regional and local area labor market information, High Priority Occupation list, as well as stakeholder input to help inform and meet workforce activity goals and objectives;
- Describing how the board projects the needs of employers, workers and jobseekers, including consideration of pipeline needs;
- Describing the local board's outreach plan designed to better understand employers and their needs as well as service providers (e.g., employment, training and education);
- Describing how the local board will ensure sufficient numbers of quality eligible providers that meet the needs of employers and individuals;
- Briefly explaining how the local board employs the procurement process cycle to support continuous improvement;
- Describing the local board's oversight roles assigned to the board and how it is implemented throughout the workforce service delivery system to support continuous improvement;
- Describing the local board's assessment and monitoring process of the service providers; include the review of training

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provider's performance data as well as qualitative information;

- Describing the local board's review, tabulation and consideration of customer satisfaction surveys; and
- Describing the local board's application of L&I's Eligible Training Provider policy; include strategies to grow in number and improve the overall quality of eligible training provider participation in the statewide eligible training provider list.

4.6. Provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area. [20 CFR § 679.560(b)(6)]

Expectation: Narrative must describe all WIOA title I adult, or A, and dislocated worker, or DW, employment and training activities in the local area, including those involving basic literacy skills, and how activities are assessed. Additionally, the narrative must reflect how the local board selects and determines availability of A and DW activities for the benefit of participants, including individuals with barriers to employment.

Factors being considered include, but are not limited to:

- Describe how the local board identifies and then determines the types of A and DW employment and training activities that will be needed in the future;
- Identify the local board's key assessment criteria and processes used to select A and DW employment and training activities (include key procurement steps that lead toward a complete assessment of the activities);
- Explain the local board's consideration of future revisions and adoption of A and DW activity assessment criteria and processes;
- Articulate the board's effort to attract a greater quantity of Title I A and DW training providers including online providers;
- Identify key employment and training activity discrepancies (if any) and solutions the board is considering and planning to implement;
- Explain how the local board determines the quantity and quality of available A and DW employment and training activities;
- (Revised) Explain the local board's WIOA Title I Priority of Service policy in brief terms highlighting how potential WIOA participants are identified and are provided access to services (do not attach the policy). Explain how the board is continuing to review local area labor force data to support local area discretionary priority groups;
- Articulate the new emphasis WIOA has placed on the need to provide services to older youth and how the local board has responded to this requirement;
- If used, explain the process implemented to transfer program funds between A and DW programs (as needed) to help ensure sufficient training opportunities for eligible participants; and
- Describe the board's operational position and current actions relative to the development and promotion of Career Pathways, co-enrollment of participants across multiple WIOA programs, and work-based training activities such as apprenticeships and OJT.

4.7. How will training services be provided using individual training accounts, or ITAs, fund programs of study, or through the use of contracts for training services fund work-based trainings. [20 CFR 679.560(b)(18)]

Expectation: Narrative must include how ITAs and contracts, as outlined in WIOA Sec. 134, will be used in a coordinated manner to provide such services in the local area.

Factors being considered include, but are not limited to:

- Describe the ITA cap for the local area, as well as the methodology used by the local board to determine the cap;
- Describe how the local board will determine the circumstances in which contracts will be used instead of ITAs;
- Describe how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided; and
- (Added) Describe how the local board will account for the registered apprenticeship structure in the use of contracts and ITAs.

Note: Narrative may contain how local areas select an ITA assessment that are valid and appropriate for the target population and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities.

4.8. Provide a description and assessment of the type and availability of youth workforce investment activities in the local area. [20 CFR § 679.560(b)(8)]

Expectation 1: Narrative must describe established priorities of the local board that allow for the service of as many eligible youth as possible, especially out-of-school youth (OSY), older youth and young people who are most at risk of not acquiring the necessary

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skills and abilities to attain meaningful employment, including individuals with a disability. Successful models of activities must be included.

Factors being considered include, but are not limited to:

- Describe the make-up of the local board's Youth Standing Committee and its role in youth program design, including making the 14 Program Elements available to participants;
- Describe how to prioritize recruitment and services to OSY (WIOA 75 percent expenditure requirement);
- Describe how to increase work experience opportunities for youth (WIOA 20 percent expenditure requirement);
- Describe how to develop strong Career Pathways;
- Describe how to increase the co-enrollment of youth into partner programming in alignment with the participant's individual service strategy and goals; and
- Describe how to leverage TANF Youth Development funding (YDF) to offer workforce activities to even more local area youth.
 - Indicate which of the 14 WIOA Youth Program Elements will be provided, the local provider organization providing the programming, activity time (i.e., year-round or summer only) and the goals for the total number/percentage of TANF youth anticipated to receive a WIOA Youth Program Element;
 - Describe who is responsible for TANF Youth Development program participants, methods used for recruitment, and collaboration with local County Assistance Office(s), or CAOs, the Department of Human Services' Employment and Training providers, PA CareerLink®, and other WIOA funded programs. Explain any agreements regarding or referral of youth to be served with WIOA funds;
 - Describe how work experiences, enhanced by high-quality academic and workforce development programming, will be prioritized for TANF youth;
 - **(Revised)** Describe in detail any job placement where the LWDB plans to increase the hourly wage (the Department strongly encourages **an increase in TANF youth participant wages for work experiences to be in alignment with the Governor's priorities as defined in Executive Order 2016-02 Amended, whenever possible**) that it has typically previously offered participants for work experiences;
 - Describe who is responsible for recruiting employers/organizations for work experiences, building and maintaining these connections and what methods are used for recruitment;
 - If applicable, identify the prospective businesses, as well as any community, education and workplace partners, that will support TANF Youth programming. Briefly describe any expected monetary and/or non-monetary contributions to the local board's youth project(s);
 - If the local board plans to use a portion of TANF funding to offer incentives to TANF youth, describe in detail the type of incentive offered. Outline how the local board will clearly explain and make this incentive opportunity available to TANF-eligible youth. Explain how to accurately measure achievement of the established incentive requirements to ensure fair and equitable disbursement of any incentive awards to TANF youth program participants;

Note: The local board ability to offer TANF incentives is contingent upon the Department of Labor & Industry's review and approval of the local board's revised Incentive Policy, in alignment with 2 CFR 200 of WIOA and USDOL's TEGL No. 21-16.

- Provide the name, phone number and email address of the LWDB staff member responsible for implementation, tracking and reporting TANF YDF activities and expenditures;
- Provide the following contact information for **each** TANF Youth Development Program-Youth Provider Sites in the LWDA: (1) Name, email and phone number of the Designated TANF Provider Contact Person(s) and (2) Name and Address of Provider's Office Location/Worksite; and
- Describe how the LWDB monitors local providers and who is responsible for the monitoring.

Expectation 2: Local boards must outline and define WIOA youth eligibility documentation requirements, including the "requires additional assistance to complete an education program or to secure and hold employment" criteria.

Expectation 3: Narrative must include a description of WIOA title IV Pre-Employment Transition Services provided to potentially eligible and eligible in-school youth with disabilities.

Expectation 4: Narrative must include local board strategies and collaborative actions with stakeholders to expose more youth support to YouthBuild, Job Corps and AmeriCorps programs and opportunities (if applicable). Data measuring the number of youth, and specifically opportunity youth, enrolled in these programs must be provided to support the narrative, as appropriate.

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Note 1: Additionally, if the local area is designated as part of a *Planning Region* the local board, in concert with the other local boards comprising the *Planning Region*, may articulate regional level strategies and activities within the regional plan (see Appendix B: *Regional Plan Instructions*, prompt 1.4).

Note 2: Categories of ‘additional assistance’ are required to be defined and developed for both in-school youth, or ISY, and out-of-school youth, or OSY. However, the 5 percent limitation for the use of this ‘additional assistance’ barrier category only applies to ISY. [WIOA (*Department of Labor Only*) Final Rule sections 681.300 and 681.310].

4.9. How will the local board coordinate workforce investment activities and ensure they are carried out in the local area with statewide rapid response? [20 CFR § 679.560(b)(7)]

Expectation: Narrative must describe the strategy and role of the local area and regional (if applicable) business service teams with the Rapid Response services. In addition, describe how the board is using the Rapid Response Guidance and Rapid Response and Trade Guidance released early 2017 to guide partners when providing rapid response services.

Note: Local boards should consider libraries as a possible place for Rapid Response teams to assemble, given their Wi-Fi, technology, and role in communities.

4.10. How will the local board coordinate relevant secondary and postsecondary education programs and activities with workforce investment activities to support strategies, enhance services and avoid duplication of service(s). [20 CFR § 679.560(b)(9)]

Factors being considered include, but are not limited to:

- Local board strategies to coordinate and enhance workforce services regarding secondary and post-secondary education. The description needs to include methods involved to avoid duplication of services;
- Accessibility improvement of post-secondary programs and expanding access to appropriate technology in career and technical education programs, especially to online training programs that may help to eliminate skill gaps;
- Local board actions related to Perkins Act Section 134 biennial “CTE comprehensive needs assessment”; include the local board’s role with secondary, adult and postsecondary Perkins V recipients;
- (Revised) Relevant education programs that include adult education, registered apprenticeship and pre-apprenticeship, community colleges, community education councils, private licensed schools; and
- Basic skills training.

4.11. Describe the plans, assurances and strategies for maximizing coordination, improving service delivery and avoiding duplication of Wagner-Peyser Act (29 U.S.C. 49 et seq.) services and other services provided through the one-stop service delivery system. [20 CFR § 679.560(b)(11)]

Expectation: The narrative must describe strategies to implement the one-stop system operational goals and how these strategies will maximize coordination among one-stop system partners. It must specifically describe how the required partners’ activities and services are improved and duplication is avoided, as well as how merit staff and contracted service providers are coordinated. Additionally, the narrative must contain information surrounding the roles of the operator and site administrator(s) in coordinating local area program providers’ efforts and improvement of services.

Factors being considered include, but are not limited to:

- How the roles and responsibilities among partner programs are coordinated to achieve optimum results and avoid duplication of services;
- The efforts that are or will be implemented to improve program partner integration at PA CareerLink® centers;
- The one-stop delivery system’s referral mechanism;
- The established minimum requirements for a PA CareerLink® career services orientation, the method used for directing basic career services customer flow, use of a customizable initial intake form and a customizable template for developing Individual Employment Plans to ensure consistency and support alignment of services across programs, thus reducing duplicate data among partners; and
- The program partner’s staff development efforts designed to strengthen the professional skills of co-located partners’ staff in PA CareerLink® centers, such as cross-program staff training. As a partner, adult education may participate in delivering training in professional skills.

4.12. How will the local board coordinate WIOA title I workforce investment activities with adult education literacy activities under WIOA Title II? [20 CFR § 679.560(b)(12)]

Factors being considered include, but are not limited to:

- Indicate if WIOA Title II adult education providers were involved in the development of the local area plan and the

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providers' involvement with the topics presented in Appendix C, prompt 4.11;

- Describe how the local board will carry out the review of applications to provide adult education and literacy activities under WIOA Title II for the local area to determine whether such WIOA Title II applications are consistent with the local area plan. The local board review must be consistent with WIOA Sections 107(d)(11)(A) and (B)(i) and WIOA Section 232 to ensure alignment with its local area plan and the coordinating of the activities described in the local area plan. Applicants for WIOA Title II grants are required to demonstrate alignment of proposed activities with the local area plan as one of the 13 required considerations under WIOA Title II;
- Describe how the local board will ensure it will make recommendations, if appropriate, to PA Department of Education (PDE) to promote alignment with the local area plan; and
- Describe how the local board will coordinate WIOA Title I workforce activities with those Title II adult education and literacy activities designed to be associated with WIOA Title I (i.e., for when the individuals participating in title I activities have basic education needs and when individuals in Title II programs have needs that may be address through Title I services or other services through the one-stop centers).

Note 1: Any WIOA Title II activities described must be allowable activities under Title II. These may include basic skills instruction both at the one-stop center and in other locations around the local area; compliant administration of standardized basic skills assessments; and workforce preparation activities for individuals receiving title II basic skills instruction.

Note 2: Guidance on the role the local board will play in their assistance with WIOA title II solicitation and procurement.

Local boards are not directly involved in WIOA Title II solicitation and procurement; the title II competition is run solely by PDE, and all funding decisions are made solely by PDE. The local boards will review applications submitted to PDE for WIOA Title II funds for alignment with the goals and strategies of the local area plan, and then provide recommendations to PDE on ways to improve alignment, if applicable.

Federal regulations require PDE to establish the process by which the local boards will review the WIOA Title II applications for alignment with the local area plan and submit recommendations to PDE for improvement of alignment. PDE will receive the applications for Title II funds and then distribute applications to the appropriate LWDB for review. PDE will develop related review documents and rubrics and provide them to the local boards along with training on how to conduct the review and return the documents to PDE. All local boards must use the review documents and rubrics provided by PDE. Local boards have flexibility in determining which members of the local board participate in the review of applications. The review work may be led by local board staff but cannot be limited to local board staff. Board members connected to entities that submit applications for WIOA title II funds or that have other conflicts of interest cannot participate in the review.

4.13. What services, activities and program resources will be provided to participants, including those outlined at WIOA Sec. 3(24), *Individuals with a Barrier to Employment*, and WIOA Sec. 188, in the local area?

Expectation: Narrative must list the services provided to participants beginning with universal services (e.g., Wagner-Peyser Act based Employment Services) and concluding with a description of how individuals with a barrier(s) to employment are uniquely served.

Factors being considered include, but are not limited to:

- (Revised) Describe how the one-stop delivery system employs a methodical process ensuring customers' accessible intake, establish participant status, determine needs of the participant and identify any barrier(s) to employment;
- (Revised) Describe how the one-stop delivery system employs a methodical outreach process that presents the benefits and services of the workforce development system to individuals and groups. A description of outreach activities may include information sessions regarding services that partner agencies provide and how to access such services. These outreach efforts may include presentations on available services that target certain populations, specifically targeting individuals with barrier(s) to employment as referenced in L1.1;
- Describe how the one-stop delivery system provides the appropriate services and resources equally to participants; and
- Describe services provided to individuals with disabilities eligible for services under WIOA Title IV.

4.14. What services, activities and program resources will be provided to businesses and employers in the local area? [20 CFR § 679.560(b)(3)]

Factors being considered include, but are not limited to:

- Roles performed by the PA CareerLink® Business Services Team, or BST, within the scope of the region as a whole; describe the BST organizational structure and who manages the BST; describe coordination efforts amongst BST members as well as actions of the local board; and indicate the program providers that comprise the BST (e.g., Veteran program LVERs, OVR staff, Rapid Response staff);

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- For program partners not specifically represented on the BST, describe how these partners are connected to employers (e.g., provision of adult basic education and workplace literacy information to employers);
- (Added) Describe how Registered Apprenticeship will be promoted and the level of involvement and expertise expected of the BST team;
- Describe regional coordination of messaging and engagement; which program providers are making employer visits and the collaboration that occurs during these visits; and the management of tracking business related services and associated data analysis for all program partners to share;
- What WIOA Title III (Wagner-Peyser Act) employer-based services, as well as other services and resources made available from partners are made available to business customers; describe how the activities and services are accessed by business and employers or their legal representatives; and offer insight into how workforce-oriented programs and services are being adopted by businesses and employers in the region;
- What WIOA Title IV (Rehabilitation Act of 1973) employer-based services are made available to business customers;
- Describe how businesses and employers engage with education; and
- If there are local board innovative practices such as the use of board staff and contracted entities providing business engagement activities and services, the narrative must detail the administrative and operational relationship between the BST and the local board business engagement efforts as well as demonstrating the reduction of duplicative services and activities.

4.15. How will the local board coordinate WIOA Title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area? [20 CFR § 679.560(b)(10)]

The narrative must explain the local area's set of strategies designed to:

- Identify supportive services and resources (e.g., transportation, public libraries, childcare, legal aid, housing, mental health, refugee and immigration services, vocational rehabilitation services, independent living services, community reentry programs); and
- Coordinate supportive services and resources to allow customers to participate.

5. COMPLIANCE

The prompts in this section are focused on the local area's compliance with federal, state and local government requirements.

5.1. Describe the cooperative agreements that define how all local area service providers will carry out the requirements for integration of and access to the entire set of services available in the local area one-stop delivery system. [20 CFR § 679.560(b)(13)]

Expectation: Narrative must include cooperative agreements (as defined in WIOA sec. 107(d)(11)) between the LWDB or other local area entities described in WIOA sec. 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under Title I of the Rehabilitation Act (29 U.S.C. 720 et seq.) (other than sec. 112 or part C of that title (29 U.S.C. 732, 741) and subject to sec. 121(f)) in accordance with sec. 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers and other efforts at cooperation, collaboration and coordination.

5.2. What is the process the local board uses to ensure the collection of the debts of lower-tier sub-recipients, because of audits?

Expectation: Narrative must describe the local board's debt-collection system and how grantees will utilize this system aggressively to ensure the collection of debts established because of sub-recipient audits. The narrative must also include procedures the grantee and fiscal agent will follow, once the amount of disallowed costs' final determination is made. Once the final determination establishes the amount of disallowed costs, the grantee and fiscal agent must follow the procedures outlined herein to collect these disallowed costs.

5.3. What action(s) is the local board taking (or will take) towards becoming or remaining a high-performing board? [20 CFR § 679.560(b)(17)]

Expectation: Narrative must address the fact that the local board will implement the actions necessary to become or remain a high-performing board once such guidance has been issued.

Factors being considered include, but are not limited to:

- Attainment of the Governor's goals as described in PA's WIOA Combined State Plan;
- Successfully performed by meeting the local area negotiated federal performance goals;

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- Sustained fiscal integrity throughout the local area and all interactions on a regional level (include employment of appropriate fiscal practices such as the adoption of internal controls and more robust procurement policies);
- Attainment of successful monitoring reports and other evaluations by federal and state oversight staff;
- Creation and employment of workforce governance and service delivery ‘best practices’ that may be modeled;
- Adoption and use of new and improved methods to reach and serve individuals with barriers to employment;
- Adoption and use of new career and training services provided for the WIOA Title I programs;
- Attainment of Pennsylvania’s training expenditure targets;
- Successful regional coordinated employer engagement practices between local Business Service Team(s) and local board(s) direct activities; and
- Sector initiatives measured through the employment of qualitative and quantitative measurements.

Note: Guidance pertaining to the actions a local board must take towards becoming or remaining a high-performing board are currently being developed. L&I considers a high-performing local board as a board that ensures the yearly attainment of goals, strategies and operational elements articulated in applicable law, regulation, contract(s) and agreement(s), PA’s WIOA Combined State Plan, Commonwealth policies, program grant and associated requirements and guidance are achieved; the board’s varied responsibilities including fiduciary and administrative are performed in a professional manner; its mission of being accountable to the workforce area stakeholders is upheld; and abides by other factors as determined by the PA Workforce Development Board.

5.4. What is the process the local board uses to provide an opportunity to have input into the development of the local area plan, particularly for representatives of business, education, labor organizations, program partners, public agencies and community stakeholders? [20 CFR § 679.560(b)(19)]

Expectation: Narrative must describe the robust collaboration among the many stakeholders to inform the contents of the plan. While WIOA and its associated regulations pay particular attention to the representatives of business, education and labor organizations, the narrative must include a description of the multiplicity of stakeholders that make up the local workforce system.

5.5. What is the process the local board uses to provide a 30-day public comment period prior to plan submission? [20 CFR § 679.560(b)(19)]

Expectation: Narrative must include a description of the process used by the local board (or planning region) to ensure the public had 30 days to review and comment on the contents of the proposed local area plan prior to its submission to the Commonwealth.

(Revised) Note 1: Narrative describing the 30-day timeframe must include the beginning and end date. In accordance with guidance, planning regions are required to post the entire regional plan for public comment in each of the local areas that make up the planning region.

Note 2: Comments submitted during the public comment period must be submitted along with the plan. Additionally, any comments made by a local board as a result of such comments, must also be included.

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ATTESTATIONS

By checking the box adjacent to each line item, the local board attests to ensuring the compliance components and documents listed are (or will be) in place and effective prior to June 30, 2023. **In the rare circumstance that something is not applicable, the local board must write "N/A" next to adjacent line item.**

The following components and documents, including local workforce system policies, must be reviewed and revised as to be aligned with WIOA for the current planning cycle **unless it is established as a best practice**. Each item must be available to L&I at any time during the planning process and monitoring or auditing processes. L&I is not requiring copies of such documents to be attached to regional or local area plans at this time.

- The _____ Local Workforce Development Area attests that each of the below referenced policies contain any required language or content and were last revised, if necessary, by this plan's effective date.
- Agreement between all counties and other local governments, if applicable, establishing the consortium of local and chief elected officials.
- Agreement between the chief elected official(s) and the fiscal agent, if a fiscal agent is designated.
- Agreement between the local area elected official(s) and the LWDB.
- LWDB policy and process that provides for nomination, appointment and removal of board members; resolutions; bylaws; code of conduct; and conflict of interest.
- Financial management policy and process including cost allocation plan; internal controls; cash management; receipts of goods; cost reimbursement; inventory and equipment; program income; travel reimbursement; audit requirements and resolution; annual report; property management; debt collection; and allowable costs.
- Local area procurement policy that must describe formal procurement procedures.
- Local area MOU.
- Program management policies and processes **must include** equal opportunity for customers; complaints and grievances; supportive services; file management; eligibility determination and verification; self-sufficiency criteria; self-attestation and certification random sampling; priority of service; training verification/refunds; individual training accounts; contracts for training services; statewide training providers list and eligibility verification; local area training provider list and eligibility criteria and process; "additional assistance" definition; work-based training policies including incumbent worker training, OJT, CT, and apprenticeship.
- It is best practice to have a** risk management policy and process including records retention and public access; public records requests; monitoring, grievance; incident; and disaster recovery plan.
- It is best practice to have a** human resources policy and process including employee classification; benefits; holidays and PTO; recruitment and selection; employee development; discipline; layoffs, terminations and severance; sexual harassment; and equal opportunity and non-discrimination.
- It is best practice to have** professional services contract(s) for administrative services such as staffing and payroll, if applicable.